

From: Tom Biksey <tbiksey@escpa.com>
Sent: Tuesday, March 21, 2006 7:55 PM
To: Michael.Cote@chemtura.com
Subject: Sistersville summary

Mike,

Regarding notification requirements:

The EPA requirements for notification regarding PCB releases require a knowledge of the amount releases, when it was released, and how it was released (the Spill Policy). We do not know any of these conditions - reportedly, there were no spills or know releases in any of the areas included in the characterization workplan (GE personnel, personal communication during May 2005 site visit). Therefore, your legal staff should make the decision on whether notification is required. The requirements for notification for cleanup will be addressed after completion of the PCB characterization work, as prescribed in § 761.61 PCB Remediation Waste. West Virginia does not have any requirements, and defers to EPA Region 3 (Mark Slusarski, WVDEP Office of Waste Management, 304/926-0499x1277). Region 3 does not have any additional notification requirements on their website beyond the TSCA guidance.

Here is a summary of the Sistersville PCB Characterization to date for talking with Mike O'Donnell:

Field work was initiated on December 12, 2005. GE personnel accompanied Environmental Strategies on a review of the sampling grids that were established in the field the first day. The sampling grids were based on the PCB Characterization Workplan approved by GE, and modifications for sampling grid SB-67 based on the August excavation work. During the review of the sampling grids, GE personnel restricted sampling at SB-67 and SB-74 due to mainly underground lines in the area, but also overhead lines and physical obstructions. This was unexpected, as the proposed sampling locations for the grids were detailed in the workplan, and based on underground utility drawings provided by GE during the original site visit in May.

At SB-67 grid, all primary sampling locations could not be collected. At the SB-74 grid area, 3 primary and 5 secondary sampling locations were restricted, and several samples were moved due to underground lines. At the SB-71 area, one secondary sample was moved due to underground lines, and one secondary sample point was added because the concrete pad did not extend into the grid area as delineated in the workplan.

SB-67 Grid - all secondary samples were collected (except where located within the limits of the excavation) and were less than the TSCA criterion of 25 mg/kg (maximum 7.9 mg/kg) indicating that the horizontal extent of soil containing PCBs greater than the TSCA criterion does not extend beyond the secondary (perimeter) samples. Because the primary samples around SB-67 could not be collected, the removal of soil in this area, and collection of confirmation samples, is recommended to complete the characterization in this area. It is noted that samples collected by Environ at the edges of the August excavation, which included SB-67, did not replicate the concentration of PCBs reported for SB-67. Environ sample E-13 (92.7 mg/kg) was located at SB-67 (350 mg/kg). In addition, Environ sample E-7 (41.3 mg/kg) located at the southeast corner of the excavation, had a concentration of PCBs greater than the TSCA criterion, but the area around this sample was restricted from sampling. This area also is recommended for removal and confirmation sampling.

SB-74 Grid - all samples collected were below the TSCA criterion (maximum 13 mg/kg), including sample DP-29 (0.2 mg/kg) collected in the location of SB-74. The area has been delineated to the extent the area was accessible, and no further characterization is warranted for this area.

SB-71 Grid - the primary samples had concentrations of PCBs greater than the TSCA criterion, and the archived secondary samples were analyzed per the workplan. The concentrations of PCBs in this area ranged up to 590 mg/kg, with both primary and secondary samples exceeding the TSCA criterion. It is recommended that additional horizontal and vertical delineation be conducted in the SB-71 grid area, and a smaller grid sampling scheme be implemented.

A workplan will be developed for additional work for SB-71 and SB-67 areas. To ensure that the additional characterization will meet EPA Region 3 expectations, the characterization work completed and new sampling locations proposed will be discussed at a meeting with the EPA Region 3 TSCA coordinator before the workplan is finalized.

Let me know if this is complete enough, I can expand on points if you would like.

Smooth seas and fair winds,

Tom

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FW PCB Investigation - MPM Plant Friendly West Virginia.txt
From: Biksey, Tom
Sent: Monday, October 22, 2007 4:01 PM
To: Michael.Cote@chemtura.com
Cc: Gelles, Michael
Subject: FW: PCB Investigation - MPM Plant Friendly, West Virginia

Attachments: 761.61 sample certification language.doc; Region 3
Alternative Sampling Plan Memo.pdf

Mike,

See below; Kelly has approved our plan, and notes the additional work that may be required for Sugar Run.

Next step is for us to complete the proposal for this work. Will discuss with Mike Gelles when he is back in town. We will need to update our quotes for concrete cutting, etc.

Mike - when are you back in town?????

Smooth seas and fair winds,

Tom

**** IMPORTANT NOTICE*****

The Pittsburgh Office of WSP Environmental Strategies has relocated - please see new address and fax below - phone the same!

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FW PCB Investigation - MPM Plant Friendly West Virginia.txt
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P Before printing, think about the environment

-----Original Message-----

From: Bunker.Kelly@epamail.epa.gov [mailto:Bunker.Kelly@epamail.epa.gov]
Sent: Monday, October 22, 2007 3:13 PM
To: Biksey, Tom
Cc: Michael.Cote@chemtura.com
Subject: Re: PCB Investigation - MPM Plant Friendly, West Virginia

Hi Tom - As per our discussion today, the proposed Phase III sampling plan, which is attached to your e-mail below, is acceptable.

I am concerned about possible PCB contamination of sediments in Sugar Camp Run located in the northwest area near sample locations DP-71 and DP-78. Sampling of the Sugar Camp Run may be necessary depending on the results of Phase III. We can discuss this further once you get the results back from this next phase of sampling.

Once you have fully characterized the extent of contamination at the site both horizontally and vertically, then the plan with all sample results and the proposed remediation action must be officially submitted to EPA Region 3. The submittal must include all the requirements set forth in 40 CFR Part 761.61(a)(3) and must include a certification page signed and dated by both the owner of the site and the party conducting the cleanup. The boilerplate for the certification page is attached for your information.

(See attached file: 761.61 sample certification language.doc)

Thank you

Kelly L. Bunker
Environmental Scientist/PCB Coordinator
U.S. EPA Region III
Waste and Chemicals Management Division
Toxics Programs and Enforcement Branch (3WC33) 1650 Arch Street Philadelphia, PA
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"Tom Biksey"
<tbiksey@escpa.com>

08/28/2007 12:53
PM

To
Kelly Bunker/R3/USEPA/US@EPA
cc
Michael.Cote@chemtura.com
Subject
PCB Investigation - MPM Plant
Friendly, West Virginia

Kelly,

Attached is the a memo describing our proposed alternative sampling plan for the Sistersville PCB investigation per your request. In addition, attached is a figure that shows the proposed locations of the sampling points, specifically with reference to the concrete pad. I have not yet received a facility-wide map from the facility as you requested.

Please let me know if you have any questions regarding our proposed approach. We look forward to Region 3's approval of our approach and the next phase of the investigations.

Smooth seas and fair winds,

Tom

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